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Attorneys for Plaintiffs Lawrence Liu and Ling-Ling Liu

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAWRENCE LIU, an individual; and
LING-LING LIU, an individual;

Plaintiffs,

v.

THE CHARLES SCHWAB CORPORATION, a
Delaware corporation;
CHARLES SCHWAB BANK, SSB, a Texas-
chartered state savings bank;
BANK OF AMERICA, N.A., a national banking
association; and
UNCHAINED TRADING, LLC, a Texas limited
liability company;

Defendants.

Case No. 4:24-cv-07400-HSG

**JOINT STIPULATION AND ORDER TO
EXTEND BRIEFING DEADLINES**

Judge: Hon. Haywood S. Gilliam, Jr.

Pursuant to Federal Rule of Civil Procedure 15(b) and Civil Local Rules 6-1(b) and 6-2, Plaintiffs Lawrence Liu and Ling-Ling Liu (“Plaintiffs”) and Defendant Bank of America, N.A. (“Defendant”), by and through their undersigned counsel of record, hereby stipulate as follows:

Background

1. The Complaint in this matter was filed on October 23, 2024. [Dkt. 1].
2. On January 10, 2025, Defendant filed a Motion to Dismiss the Complaint. [Dkt. 32].
3. On September 18, 2025, the Court entered an Order granting without prejudice Defendant’s Motion to Dismiss the Complaint. [Dkt. 40].
4. On October 7, 2025, the Parties stipulated and agreed that Plaintiff’s time to file an Amended Complaint be extended two-weeks [Dkt. 43], which was ordered. [Dkt. 44].
5. On October 23, 2025, Plaintiff filed an Amended Complaint. [Dkt. 45].
6. On November 20, 2025, Defendant filed a Motion to Dismiss the Amended Complaint. [Dkt. 46].

Agreement to Modify Briefing Schedule

7. The Parties have met and conferred and have agreed that the current briefing schedule should be modified due to attorney scheduling conflicts and previously scheduled international travel.

- Current Plaintiff’s Response Deadline: Thursday, December 4, 2025
- Current Defendant’s Reply Deadline: Thursday, December 11, 2025.

8. The Parties have agreed that the following schedule is reasonable and will accommodate both Parties’ commitments and constraints:

- New Plaintiffs’ Response Deadline: Thursday, December 18, 2025
- New Defendant’s Reply: Thursday, January 15, 2026

9. No other deadlines or case events will be impacted by this extension.

NOW THEREFORE, the Parties hereby agree that the time for Plaintiffs to file their response to Defendant's Motion to Dismiss is extended to December 18, 2025; and the time for Defendant to file its Reply shall be extended to January 15, 2026.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: November 26, 2025

By: /s/ Karl S. Kronenberger
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Attorneys for Defendant Bank of America, N.A.

ATTESTATION PURSUANT TO LOCAL RULE 5-1(h)(3)

I, Karl S. Kronenberger, am the ECF User whose ID and password are being used to file this JOINT STIPULATION AND PROPOSED ORDER TO EXTEND TIME FOR PLAINTIFFS TO FILE AMENDED COMPLAINT. In compliance with Civil Local Rule 5-1(h)(3), I attest that concurrence in the filing of this stipulation has been obtained from all signatories.


KRONENBERGER ROSENFELD, LLP

DATED: November 26, 2025

By: /s/ Karl S. Kronenberger
Karl S. Kronenberger
*Attorneys for Plaintiffs Lawrence Liu
and Ling-Ling Liu*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/26/2025


HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Judge